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April 2, 2001

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: *Docket to Establish Generic Performance Measures, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear David:

Please find enclosed the original and thirteen copies of a Motion to Accept Late Filed Petitions to Intervene along with two Petitions to Intervene filed on behalf of MCImetro Access Transmission Services, LLC ("MCImetro") and Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Jon E. Hastings
Jon E. Hastings

Jon E. Hastings by wsm
w/permission

JEH/

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 2, 2001

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

MOTION TO ACCEPT LATE FILED PETITIONS TO INTERVENE

MCImetro Access Transmission Services, LLC ("MCImetro") and Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") respectfully petition the Authority to accept the attached late filed petitions to intervene in the above-captioned proceeding. When the initial notice of filing was issued, March 30, 2001, was the deadline to file petitions to intervene and comment on issues 1 and 2. The decision to intervene was made by MCImetro and Brooks Fiber one day after the deadline to submit all motions to intervene. On March 30, 2001, the Authority issued a notice of extension of time to file comments. Now that the date to file comments has been extended until Friday, April 6, 2001, granting the late filed petitions to intervene will not prejudice any parties or affect the overall schedule for this proceeding.

Respectfully submitted,

By: _____

Jon E. Hastings

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600

P. O. Box 198062

Nashville, Tennessee 37219

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 2, 2001

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

PETITION TO INTERVENE

Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") petitions the Authority to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310.

The above-captioned docket concerns the development of a common set of performance measurements, benchmarks and enforcement mechanisms to ensure that BellSouth Telecommunications, Inc. ("BellSouth") provides non-discriminatory access to its network elements as required by the Telecommunications Act of 1996.

Brooks Fiber purchases network elements from BellSouth and therefore has an interest in the outcome of this proceeding. Granting this petition will not impair the orderly and prompt conduct of these proceedings.

An order granting the petition is attached.

Respectfully submitted,

By: Jon E. Hastings by WLM w/permission
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Nashville, Tennessee 37219
(615) 252-2306

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 2, 2001

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and
Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

ORDER

For good cause shown, the Authority finds that Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") is entitled to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310. Brooks Fiber has an interest in the development of a common set of performance measurements, benchmarks and enforcement mechanisms to ensure that BellSouth provides non-discriminatory access to its network elements. The petition is therefore GRANTED.

Chairman

ATTEST:

Executive Director

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 2, 2001

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and
Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

PETITION TO INTERVENE

MCImetro Access Transmission Services, LLC ("MCImetro") petitions the Authority to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310.

The above-captioned docket concerns the development of a common set of performance measurements, benchmarks and enforcement mechanisms to ensure that BellSouth Telecommunications, Inc. ("BellSouth") provides non-discriminatory access to its network elements as required by the Telecommunications Act of 1996.

MCImetro purchases network elements from BellSouth and therefore has an interest in the outcome of this proceeding. Granting this petition will not impair the orderly and prompt conduct of these proceedings.

An order granting the petition is attached.

Respectfully submitted,

By: Jon E. Hastings by WCM w/permission
Jon E. Hastings
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 2, 2001

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and
 Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
 Docket No. 01-00193

ORDER

For good cause shown, the Authority finds that MCImetro Access Transmission Services, LLC ("MCImetro") is entitled to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310. MCImetro has an interest in the development of a common set of performance measurements, benchmarks and enforcement mechanisms to ensure that BellSouth provides non-discriminatory access to its network elements. The petition is therefore GRANTED.

Chairman

ATTEST:

Executive Director

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the ____ day of April, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St.
Suite 2101
Nashville, TN 37201-3300

Jim Lamoureux, Esq.
AT&T Communications of the South Central States
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